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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION FOR
RELIEF FROM NON-DISPOSITIVE
PRETRIAL ORDER OF MAGISTRATE
JUDGE (DKT. 2006)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal (“Waymo’s Administrative Motion”) confidential information in its Motion for Relief from Non-
8 Dispositive Pretrial Order of Magistrate Judge (Dkt. 2006) (“Waymo’s Brief”). Waymo’s
9 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Brief	Highlighted in blue	Defendants
	Highlighted in green	Waymo
Exhibit 1 to Waymo’s Brief	Entire document	Defendants
	Highlighted in green	Waymo
Exhibit 2 to Waymo’s Brief	Entire document	Defendants
	Highlighted in green	Waymo
Exhibit 3 to Waymo’s Brief	Entire document	Waymo
Exhibit 4 to Waymo’s Brief	Entire document	Waymo
Exhibit 5 to Waymo’s Brief	Entire document	Waymo; Defendants
Exhibit 6 to Waymo’s Brief	Entire document	Defendants
Exhibit 7 to Waymo’s Brief	Entire document	Waymo; Defendants
Exhibit 8 to Waymo’s Brief	Entire document	Defendants
Exhibit 9 to Waymo’s Brief	Entire document	Defendants
Exhibit 10 to Waymo’s Brief	Entire document	Waymo

21 3. Waymo’s Brief and exhibits thereto contain information that Defendants have
22 designated as confidential and/or highly confidential.

23 4. Portions of Waymo’s Brief and exhibits thereto also contain or refer to Waymo’s trade
24 secrets. These portions, which Waymo seeks to seal, contain, reference, and/or describe Waymo’s
25 asserted trade secrets, including source code. I understand that these trade secrets are maintained as
26 secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).
27 The public disclosure of this information would give Waymo’s competitors access to in-depth
28 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If such

1 information were made public, I understand that Waymo's competitive standing would be
2 significantly harmed. Waymo's request to seal is narrowly tailored to only the confidential
3 information.

4 5. Waymo takes no position on the merits of sealing the material designated confidential
5 by Defendants under the Protective Order, and expects Defendants to file one or more declarations in
6 accordance with the Local Rules.

7 6.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct, and that this declaration was executed in San Francisco, California, on October 17,
10 2017.

11 By /s/ Felipe Corredor

12 Felipe Corredor

13 Attorneys for WAYMO LLC

14 **SIGNATURE ATTESTATION**

15 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
16 filing of this document has been obtained from Felipe Corredor.

17
18 /s/ Charles K. Verhoeven

19 Charles K. Verhoeven